



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
CARIBBEAN ENVIRONMENTAL PROTECTION DIVISION
CITY VIEW PLAZA, SUITE 7000
#48 165 RD. KM 1.2
GUAYNABO, PR 00968-8069

101714

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

William G. Gierke, P.G.
Senior Manager
Pfizer Inc.
100 Route 206 North, MS LLA-401
Peapack, NJ 07977

RE: Pfizer Pharmaceuticals LLC, Carolina Facility Remedial Action Plan
65th Infantry Avenue, Km. 9.7 Carolina, Puerto Rico
EPA ID No. PRD091197301

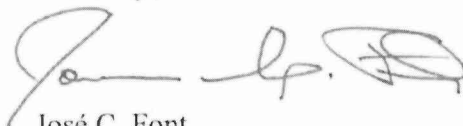
Dear Mr. Gierke,

The U.S. Environmental Protection Agency (EPA), has completed the review of the July 2014 Remedial Action Plan (RAP) for the now inactive Pfizer-Carolina Facility (Site) in Carolina, Puerto Rico. The objective of the RAP is to present a remedial strategy to mitigate exposure pathways to the chlorinated solvents, mostly Trichloroethylene (TCE), found in soil and groundwater at the Site. The strategy involves the implementation of an *in-situ* treatment system to remove TCE and its daughter products through enhanced biodegradation in shallow source area groundwater, within the core of the plume, and along the downgradient property boundary. EPA considers that the RAP is acceptable and concur with the remedial approach proposed to address soil and groundwater contamination at the Site.

In accordance with the conference call held on September 11, 2014, EPA recommends that the proposed groundwater monitoring program is used, not only to assess the effectiveness of the remedial strategy, but also to assess groundwater contamination in the deeper, fractured rock aquifer and the behavior of the Perchloroethylene (PCE) plume with respect to the *in-situ* treatment. Due to the nature of the contamination and Site conditions, EPA will consider this action as an Interim Measure to expedite the process. If in the long-term this Interim Measure achieves the final remedial goals (i.e. No further Action), EPA will issue a public notice with the tentative determination and will solicit comments prior to making a final Agency determination regarding final corrective action remedies at the Facility. Please bear in mind that it is Pfizer's responsibility to make sure implementation of remedial alternatives at the Site comply with the applicable regulatory requirements and/or permits from the Commonwealth of Puerto Rico.

EPA encourages Pfizer to ponder the alternative of engaging into a voluntary, Facility-lead agreement for Corrective Action. This is a proven effective and faster mechanism where the parties can memorialize their commitment to work together to protect human health and the environment without entering into an Administrative Order. If you have any questions regarding this matter, please contact geologist David N. Cuevas at (787) 977-5856 or through electronic mail at cuevas.david@epa.gov.

Sincerely,

A handwritten signature in black ink, appearing to read 'José C. Font', with a stylized flourish at the end.

José C. Font,
Director
Caribbean Environmental Protection Division

cc: Lorna Rodríguez, Acting Chief
EQB Land Pollution Control Program